

JAMES A. BUSTAMANTE (CABN 133675)
1000 Brannan Street, Suite 488
San Francisco, California 94103
Telephone: (415) 394-3800
Fax: (415) 522-1506
Email: john@jacksonsquarelaw.com

FORD GREENE (CABN 107601)
Hub Law Offices of Ford Greene
711 Sir Francis Drake Blvd.
San Anselmo, California 94960
Telephone: (415) 258-0360
Fax: (415) 456-5318
Email: fordgreene@comcast.net

Attorneys for BRYAN ADAMS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|---|
| UNITED STATES OF AMERICA, |) | CASE NO. 3:17-CR-00294-RS |
| |) | |
| Plaintiff, |) | STIPULATION AND PROPOSED ORDER |
| |) | EXLCUDING TIME |
| v. |) | |
| |) | |
| BRYAN ADAMS, |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

On November 7, 2017, defendant and his attorneys appeared before this Court. The parties agreed that additional time was necessary to meet with the case agent and review extensive amount of discovery that could only be viewed at the FBI's office in San Francisco. In addition, counsel had an opportunity to review other discovery materials provided electronically to defense counsel. Counsel for the defendant has extended considerable time, effort, and resources to provide the Government with an exhaustive forensic psychological and risk assessment evaluation. Therefore, additional time is necessary for parties to meet and discuss the evaluation.

Counsel for the Government has been in trial for approximately the last two weeks terminating on or about Wednesday, February 21, 2018. Counsel for the defendant and the Government therefore

1 request additional time to evaluate the information provided. The parties agree and jointly request the
2 time between February 27 and the new proposed date of March 27, 2018 be excluded in order to
3 provide reasonable time necessary for the effective preparation of counsel pursuant to 18 U.S.C. §
4 3161(h)(7)(B)(iv). The parties agree that the ends of justice served by granting the continuance outweigh
5 the best interest of the public and the defendant in a speedy trial.

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7 Respectfully Submitted,

8 DATED: February 26, 2018

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10 /s/
JAMES A. BUSTAMANTE
Attorney for Defendant BRYAN ADAMS

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13 /s/
FORD GREENE
Attorney for Defendant BRYAN ADAMS

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17 /s/
SHIAO LEE
Assistant United States Attorney


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21 **~~PROPOSED~~ ORDER**

22 For the reasons stated above, the Court finds that the exclusion of time from February 27, 2018
23 through and including March 27, 2018, is warranted and that the ends of justice served by the
24 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
25 3161(h)(7)(A). The failure to grant the requested continuance would deny effective preparation of
26 counsel, and would result in a miscarriage of justice. 18 U.S.C. §§ 3161 (h)(7)(B)(iv).

27 IT IS SO ORDERED.
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DATED: 2/26/18


HON. RICHARD SEABORG
United States District Court Judge